



## **Department of Energy**

Idaho Operations Office  
850 Energy Drive  
Idaho Falls, Idaho 83401-1563

June 10, 1999

Mr. Wayne Pierre, Team Leader  
Environmental Cleanup Office  
U.S. Environmental Protection Agency  
Region 10  
1200 Sixth Avenue  
Seattle, WA 98101

Mr. Dean Nygard, Chief  
Remediation Bureau  
Idaho Department of Health and Welfare  
Division of Environmental Quality  
Community Programs  
1410 North Hilton  
Boise, ID 83706

**SUBJECT:** Request for Extension of the OU 10-04 RI/FS Schedule and Addition of New Operable Units Titled OU 10-08 and OU 10-09 - (OPE-ER-83-99)

Dear Mr. Pierre and Mr. Nygard:

This letter replaces letter number OPE-ER-76-99 dated June 1, 1999, and addresses the comments received from EPA on June 2, 1999.

The Department of Energy-Idaho (DOE-ID) is formally requesting an extension of the May 2001 Federal Facility Agreement and Consent Order (FFA/CO) enforceable milestone for the Draft OU 10-04 Comprehensive ROD. This extension request is being made pursuant to Section 13.1 of the FFA/CO. There are three primary reasons for this request;

### **Basis for Extension**

1. The ROD schedules for several other INEEL WAGs have been extended or modified to include new operable units. The OU 10-04 RI/FS will require final information from these other WAGs and the modified schedules will not allow WAG 10 to incorporate all necessary information while adhering to the FFA/CO schedule for OU 10-04. As a result, the OU 10-04 schedule should be extended to accommodate the new WAG schedules.
2. The need for a stand-alone Native American exposure scenario was identified after the OU 10-04 Scope of Work was finalized. In order to develop this scenario, WAG 10 will have to work very closely with the tribes. The tribes have historically been resistant to schedules

that are dictated by the agencies, and this difficulty will probably be increased by the fact that the tribes have recently held elections that changed the group of people who will have to be consulted in order to develop the scenario. As a result, the OU 10-04 schedule should be extended to allow time to develop a productive relationship with the tribes.

3. New information about the potential extent of contamination at the Organic Moderated Reactor Experiment (OMRE) was identified after the draft OU 10-04 RI/FS Work Plan was submitted to the agencies. Specifically, a connection between OMRE and the EOCR injection well was identified during April 1999. This connection could have allowed contamination from OMRE to be injected deep into the vadose zone beneath the reactor site. In accordance with Section 15.3 of the FFA/CO, additional time is needed in the OU 10-04 ROD schedule to determine the impact of this new information.

Another consideration that affects the basis for extension is that institutional controls for the WAG 10 ordnance sites should be developed through consultation with the Natural Resource Trustees. The need for development of ordnance institutional control plans was understood when the FFA/CO was developed, but the difficulty associated with getting the trustees to accept these plans may not have been predicted. As a result, the OU 10-04 schedule should be extended to allow time for including the trustees in the OU 10-04 decision process.

In addition to extending the OU 10-04 ROD schedule, we are also requesting the creation of two new Operable Units, OU 10-08 and OU 10-09. These new operable units will include the site-wide groundwater assessment and evaluation of new contamination release sites that may be identified anywhere on the INEEL during the next decade. These new operable units are necessary for two reasons. First, the schedule modifications for other WAGs prevents WAG 10 from incorporating all groundwater information into the OU 10-04 RI/FS without a multi-year extension of the OU 10-04 schedule. Second, evaluating new sites under OU 10-09 will eliminate difficulties associated with the evaluation of new sites after a WAG comprehensive ROD has been signed.

OU 10-09 will be treated as a place-holder for new site evaluations. If a better approach for addressing new sites is identified before the OU 10-08 ROD is completed, then OU 10-09 will not be developed. If, on the other hand, the decision is made that new sites should indeed be addressed under OU 10-09, the OU 10-09 ROD will be completed five years after the OU 10-08 ROD.

The proposed separation of tasks between OU 10-04, OU 10-08, and OU 10-09 is as follows;

The OU 10-04 RI/FS scope will include:

- Evaluation of the risks and remedial alternatives for the WAG 6 & 10 sites
- Evaluation of the risks and remedial alternatives for the Security Training Facility (STF)
- Evaluation of site-wide ecological risks and remedial alternatives
- Evaluation of the risks and remedial alternatives for the ordnance sites
- Evaluation of the Native American exposure scenario.

The OU 10-08 RI/FS scope will include:

- Evaluation of INEEL site-wide groundwater concerns

The OU 10-09 RI/FS scope will include:

- Evaluation of sites that are passed to WAG 10 by other WAGs
- Evaluation of new sites that are discovered while the OU 10-04 and OU 10-08 RODs are being developed.

The proposed enforceable milestones for the OU 10-04, OU 10-08, and OU 10-09 projects are shown in the following table. The proposed milestone dates account for recent extensions of the other WAG schedules and allow for additional work at OMRE and development of the Native American exposure scenario.

OU 7-13/14 is currently expected to be the last comprehensive ROD that will impact the OU 10-08 groundwater investigation. As a result, we propose that the OU 10-08 ROD schedule should be tied to the OU 7-13/14 ROD schedule. If the OU 7-13/14 schedule is extended, the OU 10-08 schedule should be extended by the same amount.

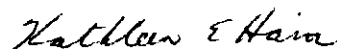
**Table 1.** Proposed enforceable milestone dates for the OU 10-04, OU 10-08, and OU 10-09 projects.

Deliverable	OU 10-04	OU 10-08	OU 10-09
Draft RI/FS Work Plan submitted to EPA and IDHW for review	Complete (11/98)	April 2002	January 2006
Draft RI/FS report submitted to EPA and IDHW for review	June 2001	January 2004	August 2008
Draft RI/FS ROD submitted to EPA and IDHW for review	April 2002	October 2004	June 2009

In accordance with Section 13.4 of the FFA/CO, a formal response to this request is required from EPA and IDHW/DEQ within seven days of receipt to formalize this extension.

If you have any questions please call P. Kroupa at (208) 526-8419.

Sincerely,



Kathleen E. Hain, Manager  
Environmental Restoration Program